

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,
Plaintiff,

v.

MARLON QUAN; ACORN CAPITAL GROUP,
LLC; STEWARDSHIP INVESTMENT
ADVISORS, LLC; STEWARDSHIP CREDIT
ARBITRAGE FUND, LLC; PUTNAM GREEN,
LLC; LIVINGSTON ACRES, LLC; and ACG II,
LLC,

Defendants,

FLORENE QUAN,

Relief Defendant,

NIGEL CHATTERJEE; DZ BANK AG
DEUTSCHE ZENTRAL-
GENOSSENSCHAFTSBANK, FRANKFURT
AM MAIN and SOVEREIGN BANK,

Intervenors,

GARY HANSEN,

Receiver.

Civil No. 11-723 ADM/JSM

**MOTION TO (1) INTERVENE
AND (2) MODIFY ORDER
APPOINTING RECEIVER**

Intervenors Topwater Exclusive Fund III, LLC, Freestone Low Volatility Partners, LP, and Freestone Low Volatility Qualified Partners LP respectfully move this Court for entry of an Order (1) granting this Motion to Intervene and (2) modifying the Court's Order of April 30, 2012 [Docket. No. 149] to permit the Receiver to immediately commence the claims process and propose a plan of distribution. This Motion is based

upon Fed. R. Civ. P. 24, the accompanying Memorandum of Law, the arguments of counsel, and all other relevant documents and proceedings in this matter.

Dated: February 7, 2013

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Partners, LP; and Freestone Low Volatility
Qualified Partners, LP*